REMARKS/ARGUMENTS

In the Final action dated December 9, 2005, claims 1, 3, 4, 5, and 12 – 15 were rejected. In response, Applicants propose amending claims 1, 3, 4, 5, and 12 – 15. Applicants hereby requests reconsideration of the application in view of the proposed claim amendments and the below-provided remarks.

I. Correction of Typographic Errors in Claims 1, 12, and 13

Applicants propose amending claims 1, 12, and 13 to correct a typographical error in the term "SONET/SD*N*." As a result of the amendments, the claims would correctly recite the term "SONET/SD*H*" instead of "SONET/SD*N*." The term "SONET/SDH" is fully supported in Applicants' specification.

II. Proposed Amendment of Claims 1, 12, 13, 14, and 15 to replace the term "working" with the term "traffic"

Claims 1, 12, 13, 14, and 15 were rejected under 35 U.S.C. 112 because the terms "working STS-N", "working STS-1", and "working frame" were not disclosed in the original specification. In response, Applicants propose amending claims 1, 12, 13, 14, and 15 to replace the term "working" with the term "traffic." Use of the term "traffic" to identify a data element is supported in Applicants' specification at, for example, page 2 lines 4 – 14 and page 8, lines 8 – 18 and Table 5. In Applicants' specification, the term "traffic" is used in contradistinction to the term "protection." For example, at pages 2 and 8, "traffic STS-1's" are distinguished from "protection STS-1's". Given the contradistinction between "traffic STS-1's" and "protection STS-1's", it is clear in Applicant's specification that data elements (e.g., STS-1's or STS-N's) identified with the term "traffic" are data elements that are used under normal conditions to carry traffic. Likewise, it is clear that data elements identified with the term "protection" are data elements that are used to carry traffic in the event of a failure.

Applicants assert that the term "traffic" as used herein has the same meaning as the term "working" as used in Chi. That is, both "traffic" and "working" are used to identify elements (e.g., a working line or a traffic STS-1) that are related to normal conditions as opposed to elements (e.g., a protection line or a protection STS-1) that are related to protection operations. Although Applicants have used the term "traffic" to identify data elements (e.g., STS-1's or STS-N's) that are used under normal conditions to carry traffic, Applicants assert that the term "working" could have alternatively been used in the specification and claims.

III. Claim Rejections Under 35 U.S.C. 102

Claims 1, 3, 4, 5, and 12 – 15 are rejected under 35 U.S.C. 102(e) as being anticipated by Chi et al. (U.S. Patent No. 6,654,341 B1, hereinafter Chi).

Claim 1

Applicants propose amending claim 1 to read as follows:

"A telecommunications network comprising:
a first SONET/SDH ring that comprises a first plurality of nodes, wherein said first SONET/SDH ring defines a first address space and wherein each of said first plurality of nodes is identified by a unique address in said first address space; and
a second SONET/SDH ring that comprises a second plurality of nodes, wherein second SONET/SDH ring defines a second address space and wherein each of said second plurality of nodes is identified by a unique address in said second address space; and
an optical fiber that carries a first *traffic STS-N* that comprises:
(1) a second *traffic STS-1 that is associated with said first SONET/SDH ring*, and
(2) a third *traffic STS-1 that is associated with said second SONET/SDH ring*;
wherein there are at least two nodes that have an address in the address space of said first SONET/SDH ring and an address in the address space of said second SONET/SDH ring, and *wherein traffic STSs are distinguished from protection STSs*."

Given the meaning of the term "traffic" as used in Applicants' specification and claims (as proposed in the current amendment), Applicants assert that Chi does not

disclose a single optical fiber that carries a single traffic STS-N that includes both a traffic STS-1 that is associated with a first ring and a traffic STS-1 that is associated with a second ring, wherein traffic STSs are distinguished from protection STSs. In fact, Chi teaches away from the multiplexing of traffic (i.e., working) STS-1's of different rings into a single STS-N that is carried on a single optical fiber. This is shown in Figure 6 of Chi in which the working paths for the three rings, W4, W5, and W6 are kept segregated and on different optical fibers. For the above-described reasons, Applicants respectfully submit that the rejection of claim 1 is overcome.

Claim 3

Applicants propose amending claim 3 to read as follows:

"The telecommunications network of claim 1 wherein the first *traffic STS-N* further comprises:
    (1) *a first automatic protection switching channel* that is associated with said *first* SONET/SDH *ring*, and
    (2) *a second automatic protection switching channel* that is associated with said *second* SONET/SDH *ring*."

The proposed amendment particularly points out that the first traffic STS-N includes automatic protection switching channels from the first and second SONET/SDH rings in addition to STS-1's from the first and second SONET/SDH rings. The subject matter of claim 3 is supported in Applicants' specification at, for example, page 9, lines 24 – 32 and page 12, lines 15 – 23.

Claim 3 is rejected in view of Chi, col. 4, lines 57 – 64. While Chi does disclose automatic protection switching channels from different rings that are multiplexed onto a single "protection" STS-N (col. 5, lines 1 – 46), nowhere does Chi disclose a single "traffic" STS-N that includes both STS-1's associated with first and second SONET/SDH rings **and** automatic protection switching channels associated with the first and second SONET/SDH rings as recited in claim 3. Because Chi does not disclose a single traffic STS-N that includes both STS-1's associated with first and second SONET/SDH rings **and** automatic protection switching channels associated with the first and second SONET/SDH rings, Applicants assert that claim 3 is not anticipated by Chi.

Claim 4

Applicants propose amending claim 4 to particularly point out that the traffic STS-N additionally includes K_1 and K_2 line overhead bytes that are associated with the first and second rings. While Chi discloses multiplexing multiple sets of K_1 and K_2 line overhead bytes into the same "protection" STS-N, nowhere does Chi disclose including K_1 and K_2 line overhead bytes related to different rings into the same traffic STS-N as recited in claim 4. Because Chi does not disclose multiplexing multiple sets of K_1 and K_2 line overhead bytes into the same traffic STS-N, Applicants assert that claim 4 is not anticipated by Chi.

Claims 5, 12, and 14

Claims 5, 12, and 14 include similar limitations to claim 1. Because of the similarities between claims 1 and claims 5, 12, and 14, the remarks provided above with reference to claim 1 apply also to claims 5, 12, and 14.

Claims 13 and 15 are dependent on claims 12 and 14, respectively. Applicants assert that claims 13 and 15 are allowable at least based on claims 12 and 15.
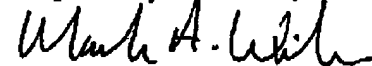
Applicants respectfully request that the above-identified amendments to claims 1, 3, 4, 5, and 12 – 15 be entered to put the claims in condition for allowance or to put the claims in better condition for appeal.

At any time during the pendency of this application, please charge any fees required or credit any over payment to Deposit Account **50-3444** pursuant to 37 CFR 1.25. Additionally, please charge any fees to Deposit Account **50-3444** under 37 CFR 1.16, 1.17, 1.19, 1.20 and 1.21.

Applicants respectfully request reconsideration of the claims in view of the remarks made herein. A notice of allowance is earnestly solicited.

Respectfully submitted,

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